



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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May 18, 2004

Ref: 8EPR-SR

Mr. Raymond Hollingsworth
119 Mineral Avenue
Libby, MT 59923

RE: Properties sampled or visually inspected by EPA

Dear Mr. Hollingsworth:

We have met several times regarding properties you own or are involved with in Libby. This letter is to summarize EPA's current position and knowledge for each property.

Eagles Building

We have performed several investigations of this building. As we've discussed, the impacts of Libby asbestos appear limited to vermiculite insulation found within concrete block walls in the "newer" or "northern" section of the building. Inspections and sampling by EPA showed no significant amount of Libby asbestos in settled dust in any portion of the building or in other building materials such as the brick and plaster found in the "older" or "southern" portion of the building. Based upon our knowledge, you should assume that vermiculite insulation is present in all locations of the concrete block walls but that other areas are likely free of contamination. However, you should be prepared to encounter vermiculite throughout the building - it is impossible for us to check every crevice and the building has varied construction.

My inspection of the building with you and Matthew last week showed that the front and side walls containing vermiculite insulation were in good condition, and that the vermiculite was well contained. The back wall is in poor condition, is crumbling, and has several holes in the concrete blocks.

You have indicated that you have several renovation plans for the building, but have not provided EPA with any detailed work plans. We have discussed your desire to cut holes into sections of the exterior walls to allow for entrance ways or windows. This would involve cutting into walls with known vermiculite. We also have discussed your desire to remove the back wall, which also contains vermiculite. Other plans have been discussed, but again, we have no indication that there will be any Libby asbestos issues associated with other parts of the building.



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EPA's response actions in Libby, and the services we can provide you, are limited. Based upon our current protocols and standards, we may take the following steps in the future:

- For the front and side walls, we cannot perform any work (e.g. cutting windows) for you. The vermiculite insulation is well-contained and poses no current health risk. Our current standard in Libby is to leave vermiculite in walls if the wall is in good condition. Our focus is on removing sources of Libby asbestos that are mostly likely to be disturbed and cause exposure. If future renovation of walls is necessary, it is currently the property owner's responsibility to conduct the work and any related asbestos abatement or containment actions. At the Eagles building, you may perform this work yourself, but we recommend that you hire a certified asbestos contractor to perform the work. We have prepared a fact sheet entitled "Living With Vermiculite" that provides some guidance for working in or around asbestos. We will also transport reasonable amounts of asbestos waste to the asbestos cell at the Lincoln County landfill if it is coordinated properly with our Libby field office.
- For the rear wall, our response could range from repair of the wall and better containment of the insulation to demolition of the wall. The scope and type of response is our prerogative. Again, you could also perform this work yourself or hire an asbestos contractor as well. If we demolished the wall, we would replace it in kind. This would obviously require extensive coordination with you and written work plan documents.

With a few weeks notice, we can transport asbestos waste at any time, but we cannot take any action on the rear wall until this early winter at the earliest. Our schedule is full and we are meeting commitments made some time ago. If you are interested in addressing the rear wall this winter, we can begin the process of developing and coordinating a work plan with you. Before any work can begin, we will need to establish that you are the rightful legal owner of the property or have the authority to grant us access to take response actions.

Other Properties

At your request, we conducted a brief visual inspection of several addresses to determine if there were any obvious signs of bulk Libby vermiculite sources that would preclude demolition and disposal at the Lincoln County landfill. We visually checked attic spaces, wall spaces, crawl spaces, basements and the exterior yard for signs of vermiculite that would preclude demolition. We did not check for other forms of asbestos, such as transite siding or asbestos pipe wrap, which the law requires be removed prior to demolition. Such materials are your responsibility. We also did not collect samples that would determine if low levels of asbestos may be present in soil or in the structures. Such samples are not critical to determine if the building could be demolished, but are important for assessing the long-term safety of the buildings and properties if they are re-occupied. Such investigations will be necessary in the future.

614 Dakota. No vermiculite observed indoors or outdoors. No concerns with demolition.

614 and 1/2 Dakota (outbuilding). Vermiculite insulation observed in the attic and leaking into walls. This building should not be demolished until the asbestos is addressed.

110 Montana. No vermiculite observed indoors or outdoors. No concerns with demolition.

110 and ½ Montana (outbuilding). No vermiculite observed indoors or outdoors. No concerns with demolition.

121 East 1st Street. No vermiculite observed indoors or outdoors. No concerns with demolition.

412 Main. Vermiculite insulation observed in the attic and around a drain pipe. This building should not be demolished until the asbestos is addressed.

1002, 1004, and 1006 Dakota. Packaged but leaking insulation observed in the basement. This building should not be demolished until the asbestos is addressed.

Again, because of our schedule and prior commitments, we will be unable to perform any cleanup at these properties this year. I hope this letter is hopeful. If you have any additional questions, please contact the EPA Information Center at 293-6194.

Sincerely,

A handwritten signature in black ink, appearing to read 'JCE', is positioned above the printed name.

Jim Christiansen
Remedial Project Manager